

**FILED**  
**IN CLERK'S OFFICE**  
**US DISTRICT COURT E.D.N.Y.**  
**\* DECEMBER 11, 2024 \***  
**BROOKLYN OFFICE**

TH:KM  
F. #2023R00649

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

ANTHONY MOTAYNE,  
KALEEK DEJORGE and  
[REDACTED] N,

Defendants.

Cr. No. 24-CR-507  
(T. 18, U.S.C., §§ 371, 641, 981(a)(1)(C),  
2 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

**Judge Ann M Donnelly**  
**Magistrate Judge MARcia M. Henry**

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THE GRAND JURY CHARGES:

I N T R O D U C T I O N

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants

1. The defendants ANTHONY MOTAYNE, KALEEK DEJORGE and [REDACTED] were residents of Brooklyn, New York.

II. The Fraud Scheme

2. In or about and between June 2023 and May 2024, within the Eastern District of New York and elsewhere, the defendants ANTHONY MOTAYNE, KALEEK DEJORGE and [REDACTED] participated in a scheme to obtain postage stamps belonging to the United States Postal Service by fraudulent means for financial gain.
3. As part of the scheme, the defendant ANTHONY MOTAYNE obtained counterfeit checks, which he provided to the defendant KALEEK DEJORGE for use at United States Post Offices to purchase postage stamps. Between approximately June 2023 and

September 2023, the defendant [REDACTED] participated in the scheme as a driver, and drove MOTAYNE and DEJORGE to different United States Post Office locations where DEJORGE used counterfeit checks to purchase postage stamps. MOTAYNE then sold postage stamps that had been purchased from United States Post Offices using counterfeit checks.

4. In total, the scheme has caused the United States Postal Service to lose approximately a quarter of a million dollars.

COUNT ONE

(Conspiracy to Steal Postage Stamps from the United States Post Office)

5. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

6. In or about and between June 2023 and May 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTHONY MOTAYNE, KALEEK DEJORGE and [REDACTED] together with others, did knowingly and willfully conspire to embezzle, steal, purloin and convert to their own use and the use of others, and without authority, sell, convey, or dispose of, money and things of value of the United States and a department and agency thereof, to wit: postage stamps belonging to the United States Postal Service, the aggregate value of which exceeded \$1,000, contrary to Title 18, United States Code, Section 641.

7. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants ANTHONY MOTAYNE, KALEEK DEJORGE and [REDACTED] together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about June 9, 2023, at approximately 8:44 a.m., MOTAYNE sent [REDACTED] a text message that read: “1585 Central Park Ave Yonkers, NY 10710 United States.”

(b) On or about September 6, 2023, at approximately 9:23 a.m., MOTAYNE sent [REDACTED] a text message that read: “83-30 Austin St Kew Gardens, NY 11415 United States.”

(c) On or about September 6, 2023, [REDACTED] MOTAYNE and DEJORGE drove to the United States Post Office located at 83-30 Austin Street in Kew Gardens, New York (“Post Office-1”).

(d) On or about September 6, 2023, DEJORGE used a counterfeit check in the amount of \$6,600 to purchase postage stamps from Post Office-1.

(e) On or about November 15, 2023, MOTAYNE sold postage stamps to a stamp seller located in Middletown, New York, an individual whose identity is known to the Grand Jury.

(f) On or about May 3, 2024, DEJORGE used a counterfeit check in the amount of \$1,360 to purchase postage stamps from the United States Post Office located at 11704 101st Avenue in South Richmond Hill, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

**COUNTS TWO THROUGH SIX**  
**(Theft of Postage Stamps from the United States Post Office)**

8. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

9. On or about the approximate dates set forth below, within the Eastern District of New York and elsewhere, the defendants ANTHONY MOTAYNE and KALEEK DEJORGE, together with others, did knowingly and willfully embezzle, steal, purloin and convert to their own use and the use of others, and without authority, sell, convey, or dispose of, money and things of value of the United States and a department and agency thereof, to wit: postage stamps belonging to the United States Postal Service, the aggregate value of which exceeded \$1,000.

COUNT	DATE	STAMPS' VALUE	POST OFFICE LOCATION
TWO	September 6, 2023	\$6,600	Kew Gardens, New York
THREE	November 4, 2023	\$3,300	Flushing, New York
FOUR	November 9, 2023	\$6,600	Flushing, New York
FIVE	April 20, 2024	\$1,360	South Richmond Hill, New York
SIX	May 3, 2024	\$1,360	South Richmond Hill, New York

(Title 18, United States Code, Sections 641, 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION**

10. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged in Counts One through Six, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to

forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.

11. If any of the above-described forfeitable property, as a result of any act or omission by the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in the forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

s/  
FOREPERSON



By: Whitman J.S. Knapp, AUSA  
BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK